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November 5, 2018

VIA ELECTRONIC FILING

David Butler, Esquire
Hearing Officer
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

The Honorable Comer H. Randall
Chairman
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: **Consolidated Docket Nos.: 2017-207-E; 2017-305-E; and 2017-370-E**
Request for Removal of All Confidential Designations

Dear Mr. Butler and Chairman Randall:

Pursuant to the Hearing Office Directive¹ issued on November 1, 2018 in these proceedings, the South Carolina Office of Regulatory Staff ("ORS") hereby requests that South Carolina Electric & Gas Company ("SCE&G") remove all confidential designations in the discovery and proceedings for the abandoned Project, except by the agreement of the parties to the limited Bechtel designation of testimony about the Vogtle project and except for Westinghouse testimony about other projects as well. Alternatively, the Commission should designate the following documents, except where otherwise noted below, as not confidential.

1. The deposition transcripts, including all corresponding exhibits used within the depositions, of:
 - a. Kenneth Browne;
 - b. Kevin Kochems;

¹ See Hearing Officer Directive Order No. 2018-161-H.

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- c. Ron Jones;
- d. Kevin Marsh;
- e. Stephen Byrne;
- f. Jimmy Addison;
- g. Ty Troutman;²
- h. George Wenick;
- i. Gary Jones;
- j. Allyn Powell;
- k. Gene Soult;
- l. Dan Magnarelli;³
- m. Terry Elam;
- n. Joni Falascino (WEC 30(b)(6));³
- o. Robert McKie;
- p. Sherri Wicker;
- q. Margaret Felkel;
- r. Barry McDonald; and
- s. Dukes Scott.⁴

- 2. All documents produced by George Wenick, Esquire to the ORS.
- 3. All documents produced by SCE&G to ORS.
- 4. All documents produced by ORS to SCE&G.
- 5. SCE&G responses and production to ORS's Audit Information Request 5-25 regarding the subpoenaed material SCE&G provided to the Department of Justice.
- 6. The documents with the following Bates identification that relate to an analysis of the EPC cost to complete estimates:
 - a. SCANA_RP0883990 and
 - b. SCANA_RP0883991.

² ORS recognizes that a minimal amount of Mr. Troutman's deposition must remain confidential as it contains information related to currently active projects and ORS does not object to this limited designation. ORS is not currently aware of the specific portions of the transcript at issue, but we will provide it when that information becomes available.

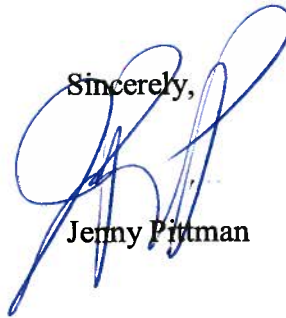
³ Counsel for Westinghouse has indicated that it intends to designate as confidential the following portions of the transcripts of Westinghouse witnesses Magnarelli and Falascino that relate to ongoing Westinghouse activities and projects other than V.C. Summer. ORS does not object to this limited designation on matters other than the V.C. Summer Units 2 & 3 Project. On page 85, line 20 from "We're" through line 22 in Magnarelli's deposition is confidential. For Falascino's deposition, page 26, starting from "He" through line 16; page 30 lines 23 through 25; page 31 lines 1 through 2, and page 32 lines 5 through 22 are confidential.

⁴ The deposition of Dukes Scott has yet to be taken, but it has been noticed for Wednesday, November 7. ORS would like to preserve the right to request that Mr. Scott's deposition be designated as nonconfidential, as well as any other depositions that occur prior to the Commission's order in these proceedings.

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ORS believes that there is no continuing or legitimate basis for the confidential designation of any of these items listed above, other than the two minimal designations mentioned in footnotes 2 and 3. In order for these proceedings to proceed efficiently and also in the public interest of full disclosure and transparency, all parties and the Commission should be able to receive and use these documents freely without the hindrance of any confidential designations.

Thank you for your consideration.

Sincerely,

Jenny Pittman

cc: All Parties of Record in 2017-207-E (via Email)
All Parties of Record in 2017-305-E (via Email)
All Parties of Record in 2017-370-E (via Email)
Joseph Melchers, Esquire (via Email)